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Re: Draft Final East Waterway Screening Memo - EPA Comments

Ravi Sanga to: Dan Berlin

02/01/2012 11:10 AM

Debra Williston - Work, Debra Williston - Home, Doug Hotchkiss, Jeff
Cc: Stern, Kirsten Payne, Lori Russo, Matt Woltman, Pete Rude, Peter
Leon, R Carscadden, "Rule, Rebecca A NWS", Susan McGroddy,

Dear Doug, Dan and Tom,

EPA has evaluated the Draft Final Remedial Alternatives and Disposal Site Screening Memorandum and has the following remaining comments that need to be addressed in order for the document to be approved. Please let me know if you have any questions.

1) Comment 24: EPA has reviewed the photos provided by the EWG and concurs that there does not seem to be evidence of an outfall present in Slip 27. EPA will follow-up with their own site visit to confirm this, but for now, considers this comment addressed.

2) Comment 25: The orientation of hatching in Figure 5 does not appear consistent with the legend. Please make the necessary corrections.

3) Comment 48 - EWG's response states that the 4th bullet of former Section 2.5 was modified to indicate that no early action areas are currently planned within the EW, however, this change was not incorporated in the redline. Please incorporate these changes into the document.

4) Comment 61 - Although EPA understands EWG's response, this response does not bring any insight into how Backup-Table B-5 Probable Construction Costs for Alt E were developed. This information is necessary to understand if the provided cost estimate for Alt E is reasonable. Within the FS, the EWG must not reference any cost information on dredging from this Screening Memo because information to back up this costing information is insufficient.

5) Comment 111 and 112 - figures from Appendix A were not provided for back check, please provide.

6) New Comment. Page 23. Section 2.6.3, last paragraph: "areas of the EW that are subjected to large vessel operations (generally north of Slip 27)": As written, this implies that there are few or no large vessels south of Slip 27. While it is true that the vessels south of Slip 27 are smaller, they may still be defined as 'large'. It all depends on the definition of 'large', which is not quantified. Please state that large vessel operations are most frequent north of 27 and less frequent south of Slip 27. It must also be stated that the largest vessels are confined to the area north of Slip 27, but some large vessels can enter the part of the Main Body Reach that is south of Slip 27.

7) New Comment. Page 24. Section 2.6.3, first paragraph: Text states "geochronology core analysis (Figure 3-1 in the Draft STER [Anchor QEA and Coast and Harbor 2011]) suggest that areas within Slip 27 and just south of Slip 27 between EW Stations 4000 and 6200 are net depositional and have not been impacted by mixing events below the surface sediments". It must be noted, in this section that localized erosion can occur at these locations, but overall deposition outpaces erosion. In addition, we do not know how emergency procedures in these areas (Ships operating outside the standard operating procedures (SOP)) might affect localized deposits in the future. Extreme procedures may actually result in deeply buried contaminants being mixed to the surface, however the geochronology indicates that this does not occur very often.

8) New Comment. Page 25. Section 2.6.5: It must be noted in this section that the PTM predicted distribution of lateral source sediments is based on hydrodynamic forces only. Specifically please state that PTM predicts the final fate of these sediments in the absence of any ship traffic. This is an active

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port. It can be expected that the navigation activity will resuspend some of these sediments and move them further distances from the outfalls. PTM output clearly indicates that some of these lateral sources sediments are deposited in regions that are susceptible to high shear stress from navigation activity. This transport mechanism for lateral source sediments is not addressed in this study. However, this section is incomplete without mentioning that PTM is not predicting the final fate of the sediments, just the fate from currents. Please change the language accordingly.

9) New Comment (P.26, S.2.7): Spatial Extent - Please remove "CSL" from the text.

10) New Comment (P.27, S.2.7): Vertical Depth - Please remove "CSL" from the text.

11) Page 27, "Sediment Stability" bullet (section 2.7): Please note that some of the regions which are listed as depositional based on geochronology still include ship-induced shear stress higher than critical. One theory may be that deposition rates outpace erosion over the long term. But it must be noted in this section that these locations may not be purely depositional.

12) New Comment (P.29, S.3): Please correct a minor editorial error. The sentence, "These RAOs are consistent with..." is lacking a period at the end.

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Dan Berlin [attachment "RADSSM Comment Responses 12..." 12/22/2011 01:53:39 PM

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Date: 12/22/2011 01:53 PM
Subject: East Waterway Screening Memo

[attachment "RADSSM Comment Responses 12-22-11.pdf" deleted by Ravi Sanga/R10/USEPA/US]

[attachment "EW Draft Final Remedial Alternatives Screening Memo_12-22-11.pdf" deleted by Ravi Sanga/R10/USEPA/US]

Ravi,

Attached is the Draft Final Remedial Alternative and Disposal Site Screening Memo and Response to Comments. Changes since the Draft are shown in redline. Please note that when shown in redline format, there are a few table formatting quirks (including a few tables without the table number and title on every page, and the appearance of a few merged cells), but these will be corrected for the final version.

The updated figures are posted on the East Waterway website. Please use the following information to access the website:

www.eastwaterwaygroup.com

The site has two levels of login credentials. Please enter the login and pass information when initially prompted:

Login: (b) (6)
Pass: (b) (6)

EPA login:

Upon entry to the site, please enter the following login credentials:

Login: (b) (6)
Pass: (b) (6)

Please let me know if you have any questions on the submittal.

Happy Holidays,
Dan

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